

**Response of
Wisconsin Power and Light Company
to
The Public Service Commission of Wisconsin
Data Request No. 1.21**

Docket Number: 05-CE-137
Date of Request: January 29, 2009
Information Requested By: Ken Detmer
Date Responded: February 17, 2009
Author: Eric Guelker
Author's Title: Mgr Environmental Services
Author's Telephone No.: (608) 458-8163
Witness: (If other than Author)

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Describe how the fleet-wide plan addresses SO₂ emissions from the Edgewater plant.

Note:

While this project is part of WPL's fleet-wide air emissions control plan, WPL can only comply with RACT by reducing NO_x emissions at the Edgewater facility.

Response:

WPL's response to Data Request 1.22 describes how WPL's fleet-wide plan addresses SO₂ emission.

The Wisconsin Department of Natural Resources (WDNR) has determined that Edgewater Unit 4 is subject to Best Available Retrofit Technology (BART). As currently approved, the BART rule allows Edgewater Unit 4 to demonstrate compliance with BART with respect to SO₂ emissions by complying with the Clean Air Interstate Rule (CAIR). The current deadline for BART compliance is December 31, 2013.

However, anticipated rules and regulations to address regional haze generally, whether via BART or otherwise, will likely result in the need for SO₂ emission reductions at one or more of the units at the Edgewater Generating Station despite WPL's ability to comply with CAIR (as currently written) through means other than installation of controls (i.e. allowances).

The WPL emissions control plan approved by senior management on March 11, 2008 (see response to 05-CE-137 Data Request No. 1.19) includes SO₂ emission reductions at the Edgewater Generating Station. WPL believes that these SO₂ emissions reductions will position it to comply with anticipated regional haze-related rules and regulations, support WPL's compliance with CAIR, or both.